

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DOVER LIMITED,	:	X
	:	
Plaintiff,	:	08 CV 1337 (LTS)(JCF)
	:	
-against-	:	
	:	AFFIDAVIT OF
	:	DELBERT D. REICHARDT
ALAIN ASSEMI, HARTSFIELD CAPITAL	:	
SECURITIES, INC., HARTSFIELD CAPITAL	:	
GROUP, STEPHEN J. LOVETT,	:	
JOHN H. BANZAF, DELBERT D. REICHARDT,	:	
MANSELL CAPITAL PARTNERS, LLC,	:	
THOMAS O. BEGLEY & ASSOCIATES,	:	
TJ MORROW and TJ MORROW PC,	:	
	:	
	:	
Defendants.	:	

STATE OF GEORGIA)
) SS.
COUNTY OF FULTON)

DELBERT D. REICHARDT, being duly sworn, deposes and says:

1. I am one of the defendants in this action and am fully familiar with the facts set forth in this affidavit.
2. I am Executive Vice-President of Argosy Capital Securities, Inc. ("Argosy"), formerly known as Hartsfield Capital Securities, Inc. ("HCS").
3. Argosy, as well as HCS, is or was, respectively, a Georgia corporation engaged in the business of providing financial services primarily to institutional investors.
4. HCS began, sometime early in 1998, when I, together with John H. Banzhaf had discussions with Mr. Steve Lovett, President of Hartsfield Capital Group,

with respect to the formation of a broker-dealer to provide broker-dealer services to clients of Hartsfield Capital Group and to others.

5. As a result, in 1998, I and John H. Banzhaf founded HCS, as a separate entity, with the intent of providing certain broker-dealer services to clients of Hartsfield Capital Group and to others.

6. I have not resided in the State of New York since 1971.

7. While, HCS (or Argosy) has been registered to conduct the securities business in the State of New York, no business has been done there, and neither I nor HCS (or Argosy) conduct any business in the State of New York.

8. Neither I nor HCS (or Argosy) maintain any bank accounts in the State of New York or solicit any business in the State of New York.

9. Neither I nor HCS (or Argosy) maintain any offices or presence in the State of New York.

10. Neither I nor HCS (or Argosy) have committed any act in the State of New York relating to the claims alleged by Plaintiff in its Complaint. I have never met TJ Morrow nor have I had any dealings with him or his company.

11. Specifically, in its Complaint, the Plaintiff references a business meeting in New York. I neither attended nor participated in that meeting in any fashion.

12. Neither I nor HCS (or Argosy) have committed any act outside the State of New York that could have injured any party or property located in the State of New York.

13. Neither I nor HCS (or Argosy) have any continuous or systematic contacts with the State of New York. All securities trades executed on the New York Stock

Exchange are conducted by our clearing firm located in Omaha, Nebraska.

Sworn to before me this
17 day of June, 2008

Nadia Simmon
Notary Public

Nadia Simmon
Notary Public, Cobb County Georgia
My Commission Expires June 6 2011

